

In the United States District Court  
Northern District of Texas  
Dallas Division

John T. Lamont and Preston  
Poulter  
Plaintiffs

v.

Dean Assaf a/k/a DA Talk and  
Victoria Kundert a/k/a Vikkiverse  
Defendants

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No. 3:21-cv-1176-K-BN

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**Declaration of Preston Poulter**

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Preston Poulter, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The facts set out in this Declaration are based on my personal knowledge.
2. I am a named plaintiff in this matter.
3. Defendants' defamatory remarks and conduct damaged my comic business, which has a focus on revenue generation on the crowd-funding site Kickstarter. During my most recent campaign on Kickstarter, former customers refused to support me citing my association with a "pedophile." The overall performance suffered a 20% drop in the average funding contributions from the last major campaign in November of 2020.
4. My income stream has been negatively impacted by Defendants'

defamatory remarks and conduct. I project \$25,000 in lost revenue this year and at least \$75,000.00 over the next three (3) years.

5. I typically attend comic book conventions/gatherings to generate additional sales and exposure. I have already been cautioned about going and have fears for my safety due to the personal attacks. Allowing \$400.00 per diem (10 hrs. per day) for additional security at these events would cost me at least \$14,000.00 through the rest of 2021.

6. I have experienced and am experiencing significant stress, lack of sleep, vexation, anxiety and worry which have prompted me to seek psychological evaluation and treatment that has already cost me \$1,500.00. Preliminary estimates call for weekly therapy over the span of many years with no guarantee of recovery. Allowing \$275.00 per qualify therapist hour puts my mental health costs at \$41,250.00 for the next 36 months.

7. I will incur additional and heightened expenses for public relations to overcome and repair the damages to my reputation and business due to the defamatory statements in an amount to be determined through an expert witness.

8. I have experienced pain and mental anguish this year and have been prevented from being able to conduct daily life functions. I will continue to suffer pain and mental anguish for a long time into the future, especially since the defamatory remarks have been disseminated into a large part of the community of comic book professionals and enthusiasts. I seek in excess of \$100,000.00 in mental anguish damages for the devastating and

continue to suffer pain and mental anguish for a long time into the future, especially since the defamatory remarks have been disseminated into a large part of the community of comic book professionals and enthusiasts. I seek in excess of \$100,000.00 in mental anguish damages for the devastating and reprehensible unfounded accusations of Defendants.

9. Damages to my reputation also exceed \$100,000.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 2, 2022.

A handwritten signature in black ink, appearing to read 'P. Poulter', is written over a horizontal line.

Preston Poulter